



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

EPA Region 5 Records Ctr.



299905

**MEMORANDUM**

REPLY TO THE ATTENTION OF:

DATE:

SUBJECT: ACTION MEMORANDUM: Request for a Ceiling Increase to complete the Time-Critical Removal action at the Lane Street Groundwater Contamination Site, in Elkhart, Indiana  
Site ID# B5LH

FROM: Ken Theisen, OSC Response Section III *KMT*

TO: Richard C. Karl, Director  
Superfund Division

THRU: Jason El-Zien, Chief *Jason El-Zien*  
Emergency Response Branch I

**I. PURPOSE**

The purpose of this memorandum is to request additional funds to permanently remove the threat posed by groundwater with TCE which is affecting private wells on Lane Street, Elkhart, Indiana. The threat will be eliminated by connecting the 26 homes on Lane Street to the City of Elkhart municipal water supply system. The cost of this work will be \$308,000, which when added to the original Action Memorandum amount of \$50,000 approved on March 25, 2008, brings the total project to \$358,000. The original Action Memorandum (see attachment 5) was to provide temporary relief to the residents by providing various types of carbon filtration units.

This site is presently not on the NPL (National Priorities List), but is currently being assessed for inclusion.

**II. SITE CONDITIONS AND BACKGROUND**

CERCLIS ID# INN 000510229

**SITE DESCRIPTION**

The Lane Street Site is located on Lane Street in a small unincorporated section of Elkhart, Indiana, Elkhart County and consists of a residential block of homes in a typical subdivision. It has municipal water available to it on both ends of the block. The Site is

bordered to the north by mixed industrial facilities, to the east by other residences, to the south by additional residences and to the west by open land. The coordinates for the Site are 41.716745° north latitude and 85.920974° west longitude.

## **ENVIRONMENTAL JUSTICE ANALYSIS**

In Indiana, the low income percentage is 29% and the minority percentage is 14%. To meet the EJ criteria, the area within one mile of the site must have a population that's twice the state low income percentage and/or twice the state minority percentage. That is, the area must be at least 58% low income and/or 28% minority. At this site, the low income percentage is 20% and the minority percentage is 8% as determined by Land View III EJ analysis. Therefore, this site does not meet the Region's EJ criteria based on demographics as identified in the "Region V Superfund EJ Analysis for the Land Street Groundwater Contamination Site".

## **SITE HISTORY**

In August of 2007 Region V received a request from Harry Atkinson from the Indiana Department of Environmental Management (IDEM), asking for assistance in dealing with a plume of contaminated groundwater that was found to be affecting private wells on Lane street with levels of trichloroethylene (TCE) above the Removal Action Level (RAL) of 300 ppb (parts per billion). At least one home on Lane Street was found to contain tce in the residential well at or above the 300 ppb guideline. The RAL is the number set by the Office of Drinking Water in Headquarters above which qualifies for immediate EPA assistance.

The OSC confirmed the IDEM sampling results and as a result, installed 13 filtration devices in the homes affected with the contamination at the time. Since that time an additional two homes have detected small amounts of contamination as the plume is moving and therefore affecting additional homes.

In July of this year, IDEM completed a subsurface investigation of the industrial area north and directly adjacent to Lane Street, in an attempt to find a responsible party and more completely delineate the direction of the contaminated plume. This work did identify a potential area of the TCE contamination, but enforcement efforts failed to identify a responsible party. Additional work by IDEM is needed to more fully understand this area.

## **III. THREATS TO PUBLIC HEALTH, WELFARE, OR TO THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES.**

### 3.

The conditions at the Site present a release or a threat of a CERCLA hazardous substance and meet the criteria for an emergency removal action provided for in the National Contingency Plan (NCP), 40 CFR§300.415 (b)(2) of the NCP as amended, 40 CFR Part 300. These criteria include but are not limited to the following.

#### **Actual or potential exposure to nearby human populations, animals, or the food chain to hazardous substances or pollutants or contaminants**

The presence of TCE in residential well water at the current RAL concentration of 300 ppb, poses as imminent and substantial threat to public health and/or the environment. In spite of the fact that filters have been installed, they have to be maintained and the well water sampled to ensure that “breakthrough” hasn’t occurred. Also, the plume is moving as evidenced by the fact that additional homes on the block are now showing minor levels of contamination.

#### **Actual or potential contamination of drinking water supplies or sensitive ecosystems**

The presence of high levels of TCE in residential wells, the fact that the source is still unknown and evidence that the plume of contamination is moving, all support this threat. The filtration systems in place require sampling and periodic maintenance to support their operation. Failure to do so will place the residents at risk from unknowingly drinking contaminated water.

#### **The availability of other federal or state response mechanisms to respond to the release**

The Indiana Department of Environmental Management requested the assistance of U.S. EPA Region V in dealing with this Time-Critical Action, since it does not have the resources to complete this action.

### **IV. ENDANGERMENT DETERMINATION**

Given the Site conditions, the nature of the suspected hazardous substances on-site, and the potential exposure pathways described in Section II and III above, actual or threatened releases of hazardous substances from this Site, if not addressed by implementing the response actions selected in the Action Memorandum, may prevent/may have prevented an imminent and substantial endangerment to public health, welfare, or the environment.

### **V. PROPOSED ACTIONS AND ESTIMATED COSTS**

The response actions described in this memorandum directly address actual or potential releases of hazardous substances at the Site, which pose an imminent and substantial

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endangerment to public health, or welfare, or to the environment. Removal activities at the Site include the following:

1. Prepare and implement a Site Health and Safety Plan
2. Secure permission from the City of Elkhart to extend their municipal water supply system down Lane Street
3. Secure a qualified contractor to design/build a municipal water supply extension on Lane Street and provide service connections to the affected 26 homes.
4. Properly abandon the residential wells of the 26 affected homes.
5. Patch streets, sidewalks and restore landscaping in the affected area.

The removal action will be conducted in a manner not inconsistent with the NCP. The On-Scene Coordinator has initiated planning for provision of Post-Removal Site Control consistent with the provisions of Section 300.415 (I) of the NCP. Elimination of the threat posed by contaminated groundwater is, however, expected to minimize the need for Post-Removal Site Control.

The removal action activities are expected to be complete within the one year statutory time limit for a removal action.

The detailed cleanup contractor costs are presented in Attachment 3 and the estimated projected costs are summarized below.

#### **REMOVAL PROJECT CEILING INCREASE ESTIMATE**

<u>Regional Removal Allowance Costs</u>	<u>Original</u>	<u>Increase</u>	<u>Total</u>
ERRS CONTRACTOR (current action)	\$40,000	\$250,000	\$290,000

#### Other Extramural Costs Not Funded From the Regional Allowance

(This cost includes estimates for: the ERRS Contractor, subcontractors, Notices to Proceed, and Interagency Agreements with other Federal Agencies and it includes a 20% Contingency)

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START (including multiplier)	\$5,000	0	\$5,000
<b>Subtotal, Extramural Costs</b>	<b>\$45,000</b>	<b>\$250,000</b>	<b>\$295,000</b>
Extramural Costs, Contingency (20%)	\$5,000	\$58,000	\$63,000
<b>TOTAL PROJECT</b>	<b>\$50,000</b>	<b>\$308,000</b>	<b>\$358,000</b>

#### **APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS**

All applicable, relevant and appropriate requirements (ARAR's) of Federal and State law will be complied with to the extent practicable. On September 9<sup>th</sup>, 2008 an electronic letter was sent to Mr. Harry Atkinson, Section Chief, State Cleanup Section with the Indiana Department of Environmental Management (IDEM), asking to identify any State ARARs that may apply. (see Attachment 6)

#### **VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN**

Failing to take, or delaying an action will only increase the possibility of residential exposure to the tce contamination found in the residential wells in the homes on Lane Street. The groundwater plume is moving and to ensure that the filtration systems currently in place in some of the homes are working properly, they have to be regularly sampled. In addition, the devices have to be maintained with regular change-outs of fresh activated carbon.

#### **VII. ENFORCEMENT**

For administrative purposes, information concerning the enforcement strategy for this Site is contained in the Enforcement Confidential Addendum.

The total U.S. EPA costs for this removal action that will be eligible for cost recovery based on full-cost accounting practices are estimated to be \$358,000

$$(\$358,000 + \$10,000) + (49.59\% \times \$358,000) = \$903,532^1$$

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<sup>1</sup> Direct costs include extramural costs and direct costs. Indirect costs are calculated based on and estimated indirect cost rate expressed as a percentage of site-specific costs, consistent with the full cost accounting methodology effective October 2, 2000. These estimates do not include pre-judgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual total costs from this estimate will affect the United States' right to cost recovery.

**XIII. RECOMMENDATION**

This decision document represents the selected removal action for the Lane Street Groundwater Contamination Site located in Elkhart, Indiana. It was developed in accordance with CERCLA as amended, and is not inconsistent with the NCP. This decision is based upon the Administrative Record for the Site (see Attachments). Conditions at the Site meet the NCP Section 300.415 (b)(2) criteria for a removal action and I recommend your approval of the proposed removal action.

The total action project ceiling increase, if approved, will be \$308,000. Of this, an estimated \$308,000 may be used for the cleanup contractor costs, bringing the total project cost, including the original action, to \$358,000. You may indicate your decision by signing below.

APPROVE  DATE 9-18-08  
Director, Superfund Division

DISAPPROVE \_\_\_\_\_ DATE \_\_\_\_\_  
Director, Superfund Division

**Enforcement Addendum****Attachments**

1. Administrative Record Index
2. Environmental Justice Analysis
3. Detailed Cleanup Contractor Cost Estimate
4. Independent Government Cost Estimate
5. Original Action Memorandum 3-25-08
6. E-mail from K. Theisen to H. Atkinson of IDEM, requesting ARARs'

Cc: D. Chung, U.S. EPA 5202-G  
M. Chezick, U.S. DOI, w/o Enf. Addendum  
H. Atkinson, IDEM, w/o Enf. Addendum

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NOT RELEVANT TO THE SELECTION OF THE REMOVAL ACTION

**ENFORCEMENT ADDENDUM**

**LANE STREET GROUNDWATER CONTAMINATION SITE  
ELKHART, ELKHART COUNTY, INDIANA**

**AUGUST 2008**

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**ENFORCEMENT CONFIDENTIAL  
NOT SUBJECT TO DISCOVERY**





# ATTACHMENT 1

## U.S. ENVIRONMENTAL PROTECTION AGENCY REMOVAL ACTION

### ADMINISTRATIVE RECORD FOR LANE STREET GROUNDWATER CONTAMINATION SITE ELKHART, ELKHART COUNTY, INDIANA

ORIGINAL  
MARCH 25, 2008  
(SDMS ID: 286278)

<u>NO.</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
1	09/05/07	U.S. EPA	File	Lane Street Site Assessment Residential Well Sampling Results for September 2007 (SDMS ID: 286276)	14
2	09/13/07	Jaworski, M., IDEM	Theisen, K., U.S. EPA	E-Mail Transmission re: IDEM Residential Well Sampling Results for the Lane Street Groundwater Contamination Site (SDMS ID: 286277)	2
3	03/19/08	Rauh, J., Weston Solutions, Inc.	Theisen, K., U.S. EPA	Site Assessment Letter Report for the Lane Street Groundwater Contamination Site (SDMS ID: 286238)	35
4	03/25/08	Theisen, K., U.S. EPA	El-Zein, J., U.S. EPA	Action Memorandum: Request for an Emergency Removal Action at the Lane Street Groundwater Contamination Site (PORTIONS OF THIS DOCUMENT HAVE BEEN REDACTED, SDMS ID: 286275)	12

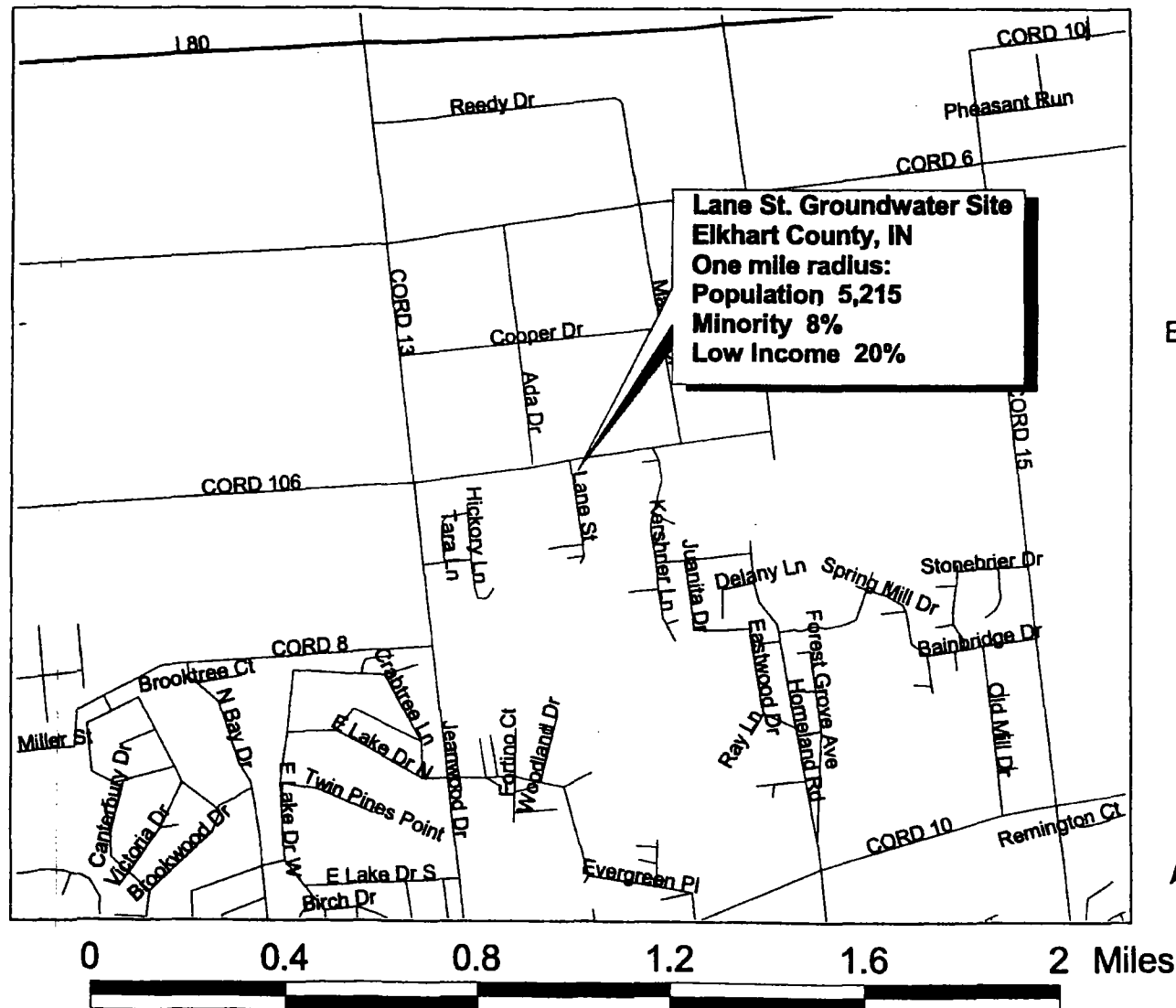
UPDATE #1  
SEPTEMBER 10, 2008

1	00/00/00	Theisen, K., U.S. EPA	Karl, R., U.S. EPA	Action Memorandum: Request for a Ceiling Increase for the Lane Street Groundwater Contamination Site (PENDING)	
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# Region 5 Superfund EJ Analysis

## Lane Street Groundwater Site

## Elkhart, IN



State of Indiana averages:

Minority: 14%

Low Income: 29%

U.S. EPA Region 5  
Environmental Justice Case Criteria  
for State of Indiana

Minority: 28% or greater

Low Income: 58% or greater

Date of Map: 11/1/07

Source of Map: Census 2000 Database/  
ArcView 3.0

### Attachment 3

#### Detailed Cleanup Contractor and START Estimate Lane Street Groundwater Site, Second Action

The estimated cleanup contractor costs necessary to complete the removal action at the Lane Street Contaminated Groundwater Site are as follows:

##### CLEANUP CONTRACTOR ESTIMATE

Personnel	\$13,000
Equipment	\$2,000
Subcontractor	\$214,000
Miscellaneous	\$21,000
20% contingency	\$50,000
<b>TOTAL</b>	<b>\$300,000</b>
START ESTIMATE	0
<b>TOTAL PROJECT</b>	<b>\$300,000</b>

## ATTACHMENT 4

INDEPENDENT GOVERNMENT COST ESTIMATE  
LANE STREET GROUNDWATER CONTAMINATION SITE  
ELKHART, ELKHART COUNTY, INDIANA

NOT RELEVANT TO THE SELECTION OF THE REMOVAL ACTION

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Attachment 3  
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

MAR 25 2008

REPLY TO THE ATTENTION OF

**MEMORANDUM**

**DATE:** **ACTION MEMORANDUM:** Request for an Emergency Removal Action at the Lane Street Groundwater Contamination Site in Elkhart, Indiana  
Spill ID# B5LH

**FROM:** Ken Theisen, OSC, Response Section III

**TO:** Jason El-Zein, Chief  
Emergency Response Branch I

**THRU:** Charles Gebien, Chief  
Emergency Response Section III

EPA Region 5 Records Ctr.

**I. PURPOSE**

The purpose of this memorandum is to request and document your approval for expending up to \$50,000 to abate a potential imminent and substantial threat to public health, welfare, and the environment posed by the Lane Street Contaminated Groundwater Site. This memorandum will also document my initial determination that an emergency response was needed and this decision resulted in the removal actions described below. This response was necessary to mitigate the immediate threat to public health, welfare and the environment posed by the release of uncontrolled hazardous substances from the Lane Street Groundwater Contamination Site.

**II. SITE CONDITIONS AND BACKGROUND**

CERCLIS ID# INN000510229

The Lane Street Groundwater Contamination Site is located on Lane Street in an unincorporated part of Elkhart, Indiana (Elkhart, County) and consists of a residential block of homes in a typical residential subdivision. Lane Street is directly adjacent to an industrial park with a variety of industries being represented.

In August of 2007 Region V received a request from Mr. Harry Atkinson, a manager with the Indiana Department of Environmental Management (IDEM), asking for Region V's assistance in dealing with a plume of groundwater contaminated with trichloroethylene (TCE). IDEM had collected six groundwater samples in mid August on Lane Street to confirm suspected

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groundwater contamination and found contamination up to 300 ppb (parts per billion) in one residence. Up to a dozen additional adjacent homes had TCE in their well water above EPA's Maximum Contaminant Level (MCL) for TCE, currently set at 5 ppb.

On September 5, 2007 OSC Theisen, together with the START Contractor collected residential well samples on Lane Street in an attempt to confirm the IDEM sampling results. EPA's results indicated a plume of TCE with concentrations confirming the IDEM results with one sample approaching the U.S. EPA's RAL of 300 ppb (Removal Action Level). The sample indicated TCE at 260 ppb, favorable to the IDEM results of 300 ppb.

OSC Theisen because of the high level of TCE at the RAL (300 ppb and 260 ppb), determined that up to an additional 12 homes on Lane Street with lesser concentrations were at risk because of their proximity to the home with the high concentration. The decision was made by the OSC to install two different types of water filtration systems, those being the "Point-of-Entry" and the "Point-of-Use" system. Access agreements were put into place with the affected homeowners and installation of the systems commenced by mid October, with all of the systems installed by the end of the month.

For the detailed Environmental Justice Criteria (EJ) specific to this Site, see Attachment 2.

### III. THREATS TO PUBLIC HEALTH, WELFARE, OR TO THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES.

The conditions at the Site present a release or a threat of a CERCLA hazardous substance, and meet the criteria for an emergency removal action provided for in the national Contingency Plan (NCP), 40 CFR § 300.415 (b) (2). These criteria include the following identified below (check applicable):

☒ yes    ☐ no    i. Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants.

The presence of TCE in residential well water in concentrations at or above the current EPA Removal Action Level constitutes an exposure to human populations on Lane Street.

☒ Yes    ☐ no    ii. Actual or potential contamination of drinking water supplies or sensitive ecosystems.

The presence of TCE in drinking water at the RAL confirms this threat.

Yes    ☒ no    iii. Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other storage containers, that may pose a threat of release.

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Yes    ☒ no    iv. High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface that may migrate.

Yes    ☒ no    v. Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released.

☒ Yes    no    vi. The availability of other federal or state response mechanisms to respond to the release.

The Indiana Department of Environmental Management requested the assistance of U.S. EPA in dealing with this time critical emergency.

Yes    ☒ no    Other situation or factors that may pose threats to public health or welfare of the United States or the environment.

#### IX.    ENDANGERMENT DETERMINATION

Given the Site conditions, the nature of the suspected hazardous substances on-site, and the potential exposure pathways described in Section II and III above, actual or threatened releases of hazardous substances from this site, if not addressed by implementing the response actions selected in this Action Memorandum, may prevent/may have prevented an imminent and substantial endangerment to public health, welfare, or the environment.

#### IV.    PROPOSED ACTIONS AND ESTIMATED COSTS

The OSC has completed the following emergency removal action to mitigate threats posed by the presence of high levels of TCE in residential drinking water wells at the Lane Street Contaminated Groundwater Site:

##### Activities

Developed and implemented a site health and safety plan

Delineated the extent of the plume of contamination

Installed and will maintain for one year either "point-of-use" or "point-of -entry" activated carbon water purification systems

Analytical samples of treated water to insure filter effectiveness

The removal action will be conducted in a manner not inconsistent with the National Contingency Plan (NCP). The OSC has initiated planning for provisions of post-removal site control consistent with the provisions of Section 300.415 (1) of the NCP. This will consist of the IDEM maintaining the filtration systems after the one year statutory EPA time limit has expired,

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until such a time as the permanent remedy, namely connecting the affected homes to the City of Elkhart municipal system has been achieved.

The response actions described in this memorandum directly address actual or threatened releases of hazardous substances, pollutants, or contaminants, at the site which may pose an imminent and substantial endangerment to public health and safety and the environment. These response actions do not impose a burden on the affected property disproportionate to the extent to which that property contributes to the conditions being addressed.

Removal activities took approximately 10 days to complete.

#### Costs

The estimated costs for this removal action were as follows:

ERRS	\$40,000
START	\$5,000
CONTINGENCY	\$5,000
TOTAL	\$50,000 (\$ not to exceed \$50k for this format)

#### Applicable or Relevant and Appropriate Requirement (ARAR's)

All applicable, relevant, and appropriate requirements (ARAR's) will be complied with to the extent practicable considering the exigencies of the situation. Federal and State ARAR's identified at the site include:

U.S. EPA Region V guidance concerning RAL's (removal action levels) concerning residential well contamination

IDEM asked U.S. EPA to remediate down to MCL (maximum contaminant levels)

#### V. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Given the site conditions, the nature of the hazardous substances documented on-site, and the potential exposure pathways to nearby populations described in Sections II and III above, actual or threatened release of hazardous substances from the Site, if not addressed by implementing the response actions selected in this Action Memorandum, would have presented an imminent and substantial endangerment to public health, welfare, or the environment.



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## VI. OUTSTANDING POLICY ISSUES

None

## VIII. ENFORCEMENT

The total EPA costs for this emergency action base on full-cost accounting practices that will be eligible for cost recovery are estimated to be \$89,754 <sup>1</sup>

$$(\$50,000 + \$10,000 \text{ (H.Q.)}) + 49.59\% \times (\$50,000 + \$10,000) = \$89,754$$

For administrative purposed, information concerning the enforcement strategy for this site is contained in the Enforcement Confidential Addendum. (attachment 3)

<sup>1</sup> Direct Costs include direct extramural costs and direct intramural costs. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site-specific direct costs consistent with the full cost accounting methodology effective October 2, 2000. These estimates do not include pre-judgment interest, do not take into account other enforcement costs including Department of Justice costs and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual costs from this estimate will affect the United States' right to cost recovery.

## IX. RECOMMENDATION

This decision document represents the selected removal action for the Lane Street Contaminated Groundwater Site, Elkhart, Indiana, developed in accordance with CERCLA as amended, and not inconsistent with the NCP. This decision was based on the administrative record for the site. Conditions at the Site meet the NCP Section 300.415 (b)(2) criteria for an emergency removal and I recommend your approval of the emergency action.

This total emergency action project ceiling if approved will be \$50,000. Of this, an estimated \$45,000 may be used for cleanup contractor costs. You may indicate your decision by signing below.

APPROVE:

JO - CH -  
Chief, Emergency Response Branch I

DATE:

3-25-08

DISAPPROVE:

\_\_\_\_\_  
Chief, Emergency Response Branch I

DATE:

\_\_\_\_\_

## Attachments:

1. Administrative Record Index
2. Environmental Justice Analysis
3. Enforcement Confidential Addendum
4. Detailed Government Contractor Cost Estimate
5. Independent government Cost Analysis

cc:

D. Chung, U.S. EPA 5202G  
M. Chezick, U.S. DOI, w/o Enf. Addendum  
H. Atkinson, IDEM w/o Enf. Addendum

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NOT RELEVANT TO THE SELECTION OF THE REMOVAL ACTION



## ATTACHEMENT 1

### U.S. ENVIRONMENTAL PROTECTION AGENCY REMOVAL ACTION

#### ADMINISTRATIVE RECORD FOR LANE STREET GROUNDWATER CONTAMINATION SITE ELKHART, ELKHART COUNTY, INDIANA

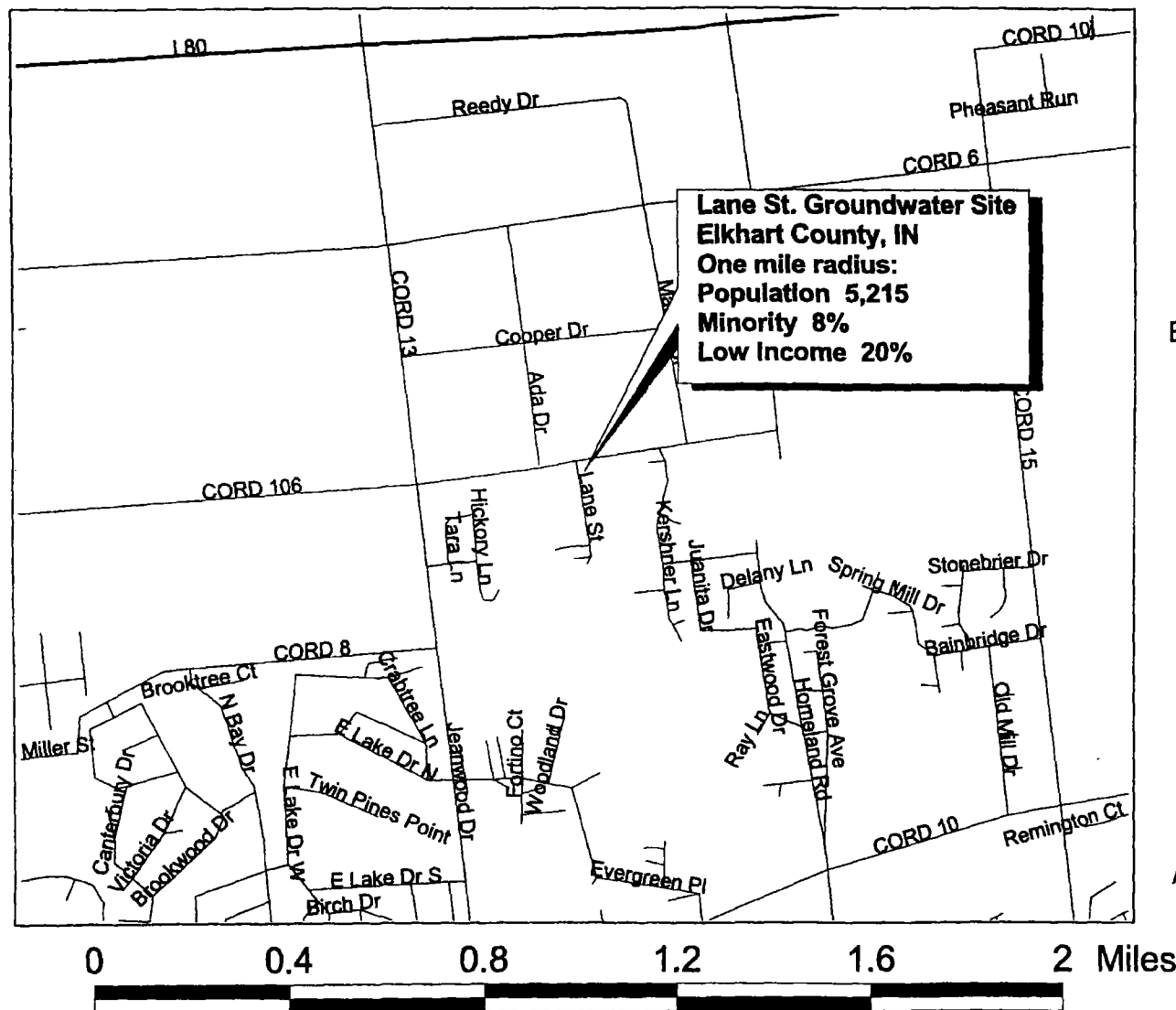
ORIGINAL  
JANUARY 31, 2008

<u>NO.</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
1	09/05/07	U.S. EPA	File	Lane Street Site Assessment Residential Well Sampling Results for September 2007	14
2	09/13/07	Jaworski, M., IDEM	Theisen, K., U.S. EPA	E-Mail Transmission re: IDEM Residential Well Sampling Results for the Lane Street Groundwater Contamination Site	2
3	00/00/00	Theisen, K., U.S. EPA	Nachowicz, L., U.S. EPA	Action Memorandum: Request for an Emergency Removal Action at the Lane Street Groundwater Contamination Site (PENDING)	

# Region 5 Superfund EJ Analysis

## Lane Street Groundwater Site

## Elkhart, IN



State of Indiana averages:

Minority: 14%

Low Income: 29%

U.S. EPA Region 5  
Environmental Justice Case Criteria  
for State of Indiana

Minority: 28% or greater

Low Income: 58% or greater

Date of Map: 11/1/07

Source of Map: Census 2000 Database/  
ArcView 3.0

# **ATTACHMENT 3**

## **ENFORCEMENT ADDENDUM**

**LANE STREET GROUNDWATER CONTAMINATION SITE  
ELKHART, ELKHART COUNTY, INDIANA**

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**ENFORCEMENT CONFIDENTIAL  
NOT SUBJECT TO DISCOVERY**

## **ATTACHMENT 4**

**DETAILED CLEANUP CONTRACTOR AND START ESTIMATE  
LANE STREET GROUNDWATER CONTAMINATION SITE  
ELKHART, ELKHART COUNTY, INDIANA**

**NOT RELEVANT TO THE SELECTION OF THE REMOVAL ACTION**

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## **ATTACHMENT 5**

**INDEPENDENT GOVERNMENT COST ANALYSIS  
LANE STREET GROUNDWATER CONTAMINATION SITE  
ELKHART, ELKHART COUNTY, INDIANA**

**NOT RELEVANT TO THE SELECTION OF THE REMOVAL ACTION**

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